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JOEL C. CLEMENTS
Chairman, President & Chief Executive Officer

120

June 8, 2005

Robert E. Feldman, Executive Secretary Attention: Comments, Federal Deposit Insurance Corporation 550 17<sup>th</sup> Street, NW Washington, DC 20429

Dear Mr. Feldman:

It appears to me that the banking system in America is in the best shape it has ever been with record earnings and fewest problem banks in many years.

Why try to fix something that is not broken? The bankers and the regulators understand the existing classification system and have developed a common vocabulary and understanding of "special mention," "substandard," and "doubtful."

Please leave well enough alone.

Sincerely,

Joel C. Clements

Chairman, President and CEO

ICC/sb